

**In The Matter Of:**

***GOOGLE INC., A DELAWARE CORPORATION, v.  
RICHARD WOLFE, ET AL.,***

---

***CRAIG NEVILL-MANNING  
September 28, 2006***

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**NEVILL-MANNING, CRAIG - Vol. I**



**EXHIBIT A**

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note that he may have responsive information on some of the other topics as well, but I didn't check them all, but the ones you identified, I can confirm other than 55 he was designated.

MR. GIBSON: Okay. Good.

BY MR. GIBSON:

Q. Before we get started, are you aware that earlier in this lawsuit two depositions had been taken, one of Mr. Wolfe, who is the defendant, and one of Rose Hagan, who is in-house counsel at Google?

A. I was aware of Rose Hagan's deposition. I wasn't aware of the other one.

Q. Have you looked at or reviewed either of the transcripts from those proceedings?

A. I have not.

Q. I'm going to ask you a couple of questions about document retention policies, et cetera here, and I'd like to start off by asking you if you would describe in your own words what Google's document retention policy is in general with respect to documents.

A. We don't have a document retention

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3 (Pages 6 to 9)

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 2 policy.  
 3 Q. There is no formal policy?  
 4 A. That's correct.  
 5 Q. So with respect to Google -- sorry --  
 6 the Froogle product, any documents that would be  
 7 relevant to that, product development documents,  
 8 any document, who keeps those?  
 9 A. There's no one person designated to  
 10 keep those, but people have some of those, that  
 11 information, on their hard disk on their computer.  
 12 Q. Is there an individual at Google who  
 13 is responsible for any type of document retention  
 14 at all?  
 15 A. No, not to my knowledge.  
 16 MR. AL-SALAM: Did you mean about  
 17 Froogle or just anything?  
 18 MR. GIBSON: Any.  
 19 MR. AL-SALAM: Is there anything in  
 20 the whole company?  
 21 I object.  
 22 Lack of foundation.  
 23 Beyond the scope of the 30(b)(6)  
 24 notice.  
 25 Just to be clear, there are people

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2 commercial products at Google.

3 Q. Do you know the time period that she

4 was the product manager for Froogle?

5 A. I don't remember exactly when she

6 started on the project. In the order of 12 months

7 ago, and she ceased, obviously, when the project

8 was canceled, which I believe we have in the

9 discovery, but it was on the order of several

10 months ago.

11 Q. So did she replace Pearl?

12 A. There was one other product

13 manager -- I'm sorry. There were two other

14 product managers in the intervening time between

15 Pearl and Bindu.

16 Q. Do you know who those two individuals

17 were?

18 A. Yes.

19 Q. Can you tell me the names, please.

20 A. Raja Shah and Karen Padham.

21 Q. Do you know if there is a formal

22 written advertising budget for the Froogle mark?

23 A. Not to my knowledge.

24 Q. If there was one, would you be the

25 person responsible for it?

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2 A. No.

3 Q. Who would, if you know?

4 A. I don't know, but like I said, it's

5 small.

6 Q. I'm sorry?

7 A. I did find out the extent that it's

8 small, like I said, on the order of a few tens of

9 thousands of dollars per year.

10 Q. Okay.

11 What I'm trying to understand is,

12 somebody has been allocated money in a budget to

13 spend on advertising the Froogle product. Is that

14 a true statement or no?

15 A. I -- I -- I don't --

16 Q. You don't know?

17 A. I'm not sure, no.

18 Q. You don't know who would have

19 responsibility for that budget, if, in fact, there

20 even is one?

21 A. All I -- all I know is it would be

22 somebody in marketing who deals with that.

23 Q. Who is the head of the marketing

24 department?

25 A. You know what, I don't know their

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13 (Pages 46 to 49)

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2 name. It's -- marketing is not something I deal  
 3 with on a regular basis and it's not a function  
 4 that's particularly important at Google.  
 5 Q. Why do you say that?  
 6 A. Most of our customers or users come  
 7 via word of mouth rather than as a result of  
 8 explicit marketing.  
 9 Q. Was that the case with the Froogle  
 10 product?  
 11 A. Yes.  
 12 Q. Okay.  
 13 So I don't want to -- you don't know  
 14 if there's a formal written advertising budget for  
 15 Froogle, correct?  
 16 A. That's correct.  
 17 Q. You don't know who would be  
 18 responsible for it if there was one?  
 19 A. That's correct.  
 20 Q. You have no idea, I take it then, how  
 21 any of the budget for advertising Froogle was  
 22 developed?  
 23 A. No, I don't. I got to the point  
 24 where it was a negligible -- found out that it was  
 25 a negligible amount of money and I didn't follow

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2 it up.  
 3 Q. So you met with -- I'm not going to  
 4 attempt the name, but a person who informed you as  
 5 to how much the advertising budget was?  
 6 A. I made a phone call.  
 7 Q. You met with that person?  
 8 A. I made a phone call.  
 9 Q. Was that in preparation for today's  
 10 deposition?  
 11 A. It was.  
 12 Q. Do you know if there's any reports  
 13 that confirmed any expenditures on advertising on  
 14 promoting the Froogle name?  
 15 MR. AL-SALAM: Objection.  
 16 Vague.  
 17 A. Not that I'm aware of.  
 18 Q. Do you know if there's currently a  
 19 marketing plan for the Froogle product?  
 20 A. I'm reasonably confident that there  
 21 is not, since we decided not to continue to  
 22 promote the brand.  
 23 Q. Was -- do you know if there was ever  
 24 a marketing plan for the Froogle product?  
 25 A. There was a marketing plan, but it

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2 was a very small one.  
 3 Q. But what?  
 4 A. It was a very simple one.  
 5 Q. Were you involved in any way in  
 6 developing that plan?  
 7 A. I was not.  
 8 Q. Do you know anything about the  
 9 marketing plan?  
 10 A. From what I've -- only what I've seen  
 11 in the meetings, and I believe those meetings'  
 12 presentations are in the discovery.  
 13 Q. They're in the discovery?  
 14 A. Yes.  
 15 Q. What do you mean by that?  
 16 A. They're in the GPS notes -- I'm  
 17 sorry -- the GPS presentation that we raised and  
 18 that's found in discovery.  
 19 Q. Were you present at the marketing  
 20 meetings when the plan was developed?  
 21 MR. AL-SALAM: Assumes facts not in  
 22 evidence.  
 23 But go ahead.  
 24 I'm not sure there were market  
 25 meetings, but you can answer.

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object to facts not in evidence.

I never heard him say the words

"marketing meetings."

MR. GIBSON: Let's ask him then.

Q. Were there ever marketing meetings?

A. Not to my knowledge.

Q. You never attended any marketing meeting for the product Froogle?

A. No.

Q. So I take it you have no knowledge of any marketing plan, if, in fact, there even is one, for the Froogle product?

MR. AL-SALAM: Mischaracterizes his testimony.

But you can answer.

A. I'm not aware of any marketing plan, but I don't believe that there's ever been a detailed plan of how to market Froogle.

Q. Do you have -- I may have asked you this earlier. If I did, forgive me. Do you have any responsibility for marketing the Froogle product at Google?

A. No, I do not.

Q. Do you have any responsibility for

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That was our paramount concern, and consideration of revenue wasn't significant.

Q. So the general concerns were of how the product would look, what were consumers looking for --

A. Correct.

Q. -- that type of --

A. Correct.

MR. GIBSON: You guys want to take a break?

MR. AL-SALAM: Sure.

(A recess was taken.)

Q. Mr. Nevill-Manning, earlier this morning you mentioned a checklist of departments that needed to be, I guess, appraised of what's going on with the Froogle product as it went through the development stage; is that correct?

A. I think I said there was no formal written-down checklist. I think I said there was something akin to a checklist. Essentially there is a list of departments you normally consult with, but it wasn't a piece of paper that you have to check off.

Q. Do you know or recall whether one of

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2 the departments that was considered to be  
3 important in that checklist process was legal?

2  
3

4 A. That's not one I remember in the  
5 meetings.

4  
5

6 Q. Earlier this morning I also asked if  
7 you knew who was in charge of the marketing  
8 department --

6  
7  
8

9 A. Yeah.

9

10 Q. -- at Google, and I think you  
11 indicated that you didn't know the person's name?

10  
11

12 A. No, I didn't know that.

12

13 Q. Do you know any individual -- the  
14 name of any individuals in the marketing  
15 department at Google and--

13  
14  
15

16 A. Yes.

16

17 Q. -- if so, can you give them to me,  
18 please?

17  
18

19 A. The one I remember is Doug Edwards,  
20 who is the marketing -- I believe the head of  
21 marketing at the time we launched Froogle.

19  
20  
21

22 Q. Is he still employed by Google?

22

23 A. He's not.

23

24 Q. Do you know where he is employed?

24

25 A. No, I do not.

25

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Page 61

2 Q. Do you know anyone else who currently  
3 works in the marketing department at Google?

1  
2

4 A. Yeah. I know -- I know -- I know one  
5 other person who is responsible for designing  
6 collateral. He's a page-layout person.

3  
4  
5

7 Q. Is there anyone else you know in the  
8 marketing department at Google?

6  
7

9 A. No. As I said, it doesn't have a  
10 high profile at Google.

8  
9  
10

11 Q. How many people are in the marketing  
12 department at Google? Do you know?

11  
12

13 A. That I don't know.

13

14 Q. Probably not a lot based on what you  
15 said.

14  
15

16 A. I believe that to be true.

16

17 Q. And I'm sorry. The fellow who does  
18 the page layouts --

17  
18

19 A. His name is Devin Ivester.

19

20 Q. Mr. Nevill-Manning, are you familiar  
21 with Mr. Wolfe's product Froogles?

20  
21

22 A. Not particularly. I visited it once,  
23 but I've not spent more than 30 seconds with the  
24 product.

22  
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25 Q. Have you ever been on the Website

25

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A. There is a team that receives those e-mails and replies to them.

Q. Is it a team or a department?

A. It's called -- it's called users' support. Whether it's a team or a department, I'm not sure exactly, you know, where to draw the line.

Q. Do you know who is responsible for the users' support function at Google as it relates to the Froogle product?

A. There's no distinction made. There is no specific team dedicated to questions about Froogle, per se.

Q. Okay.

A. But the manager of the users' support team at Google, I believe, is Denise Griffin.

Q. Other than knowing that Denise Griffin manages the user support area and e-mails can be sent to that area regarding customer complaints, do you have any other knowledge at all as to how Google handles consumer complaints?

A. As a general rule, we try to be helpful, but because services are provided gratis there, you know, it's a fairly light-weight

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Q. Mr. Nevill-Manning, do you have any responsibility at Google for consumer complaints?

A. No, I do not.

Q. Do you know if there is such a department or activity at Google?

A. There is a -- there is a function for receiving e-mail, unsolicited e-mail that Google gets. In some cases, there are complaints about our service, but since users don't pay for our services in general, those responses are really a courtesy.

Q. So there is some e-mail address that consumers can send in complaint messages to?

A. There is not a e-mail address designated for that purpose, but there are e-mail addresses at Google that people can find.

Q. But if I'm a consumer using your product and I don't like something, how do I get to you? How do I explain that to you?

A. I believe there's a page on the Google.com site with a mechanism for sending e-mail to us.

Q. And do you know who would receive that e-mail?

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process.

Q. Let me help you out a little bit. What I'm looking for is the types of complaints, the number that come in, the number of complaints. Do you have any information on something like that?

A. I don't.

Q. But Denise Griffin is the person, in your opinion, that would be most likely able to answer questions like that?

MR. AL-SALAM: Objection.

Vague.

I'm not sure what questions you're referring to.

You can answer.

MR. GIBSON: Let me clarify then before he answers.

Q. I'm talking about how consumer complaints are received by Google, the types of complaints that are received, the number of complaints that are received at Google from consumers?

MR. AL-SALAM: About anything?

MR. GIBSON: About anything.

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A. Yes, I believe she is the best person to answer these questions.

Q. And if we wanted to fine-tune it a little with respect to the Froogle product, would she still be the same person to ask these questions to?

A. I believe so.

Q. Mr. Nevill-Manning, do you have any knowledge about any market surveys or market research that Google has done with respect to the Froogle mark?

A. No, I'm not aware of any surveys that have been done.

Q. Do you -- you're saying you don't know if any surveys were done?

A. I don't know if any surveys have been done. If they were done, I have reasonable confidence I would have seen them.

Q. But you're not sure whether any survey, market survey, has been done or not? You're just saying if it was done, you are reasonably comfortable you would have seen it --

A. That's correct.

Q. -- at some point in time?

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organization reports into.

Q. Who is that?

A. Elliot Schrage.

Q. Do you know what Mr. Schrage's job responsibilities are at Google?

A. They include public relations. I believe they are chiefly public relations, internal communication, and I believe marketing.

Q. Do you know what makes you say "I believe marketing"?

A. Because the organization is somewhat fluid and he started with the company relatively recently and that function previously was associated with public relations, and so I believe it still is, but I haven't seen that written down in black and white.

Q. Now, when I asked you earlier if you knew who the head of the marketing department was, I'm assuming you answered that today.

A. Yes, that's correct.

Q. Did you ever know who the head of the marketing was --

A. Yes.

Q. -- from the time Froogle was

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developed to the time it was released?

A. Yes, I did.

Q. Can you give me that person's name?

MR. AL-SALAM: Asked and answered.

Go ahead.

A. Douglas Edwards, Doug Edwards.

Q. Other than him, other than Mr. Edwards, was there ever anyone other than Mr. Edwards who was the head of the marketing department during the time period of 2000 through today, that you know of?

A. There was somebody. I don't know their name.

Q. And just to wrap up where we left off with market research, that's not -- surveys, market research, has nothing to do with your job responsibility at Google?

A. That's correct.

Q. Mr. Nevill-Manning, do you have any knowledge or responsibility for licensing either the Google or Froogle marks at Google?

A. I'm sorry. What was the question again?

Q. Do you have any responsibility for

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20 (Pages 74 to 77)

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not prepared Mr. Nevill-Manning to testify against the evidence supporting the allegations in our complaint.

In our view, the only remaining allegations in the case are going to be the claims by your clients against Google. The only issue is whether or not our complaint gets dismissed without cost or with cost. We've agreed to dismiss the complaint with prejudice. I told you and I told Rob we are going to bring that motion promptly. For that reason, we did not prepare Mr. Nevill-Manning on that subject.

MR. GIBSON: Well, Ramsey, just so I can have my piece, you've been telling us that for months. It hadn't been done today. You're showing up for the deposition today. Why you wouldn't prepare him or inform us that you haven't prepared him is beyond me. So I'm going to ask my questions. You can object if you like.

MR. AL-SALAM: May I have a

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Tracy will read it back to you. The question I want to know is: As you sit here today, what evidence do you have to support the allegations made in paragraphs in the complaint?

A. Say that again.

Q. What evidence do you have to support the allegations made in the paragraphs of the complaint? I'll give you the paragraph numbers.

MR. AL-SALAM: I'd just like to object as lack of foundation.

Beyond the scope of the 30(b)(6) notice.

It's calling for a legal conclusion.

MR. GIBSON: You know, what does 47 ask for in the notice?

MR. AL-SALAM: Since the time of these objections, we have agreed to dismiss our complaint. I realize you've not agreed to the formal dismissal. As I told your partner, Mr. Powley, we are going to dismiss it one way or the other. We're just going to have to bring a motion. I did not -- given that, we have

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A. She may or may not.  
 MR. GIBSON: I have no other  
 questions for the witness.  
 MR. AL-SALAM: Me either.  
 (Time noted: 3:13 p.m.)

CRAIG NEVILL-MANNING

Subscribed and sworn to before me  
 This \_\_\_\_ day of \_\_\_\_\_, 2006.

# CERTIFICATE

STATE OF NEW YORK )  
 : SS.:  
 COUNTY OF QUEENS )

I, TRACY ECKHOFF, a Shorthand Reporter and  
 Notary Public for the State of New York, do hereby  
 certify:

That CRAIG NEVILL-MANNING, the witness  
 whose deposition is hereinbefore set forth, was  
 duly sworn by me, and that such deposition is a  
 true record of the testimony given by such  
 witness.

I further certify that I am not related to  
 any of the parties to this action by blood or by  
 marriage and that I am in no way interested in the  
 outcome of this matter.

IN WITNESS WHEREOF, I have hereunto set my  
 hand this \_\_\_\_ day of \_\_\_\_\_, 2006.

TRACY ECKHOFF

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STATE OF NEW YORK )  
 ss:  
 COUNTY OF NEW YORK )  
 I wish to make the following changes, for the  
 following reasons:

## PAGE LINE

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Subscribed and sworn to before me  
 this \_\_\_\_ day of \_\_\_\_\_, 2006.

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